

**MEMO ENDORSED**



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January 10, 2007

**Via Facsimile Only**

Honorable James C. Francis, IV  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**USDC SDNY**  
**DOCUMENT**  
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FILE IN ALL  
RNC CASES

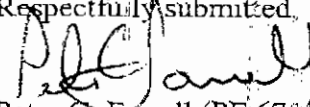
Re: *Schiller v City of New York*, 04 CV 7922 (KMK) (JCF) **LEAD CASE**  
*Dinler v. City of New York* 05 Civ. 8453 (KMK) (JCF)  
*RNC Consolidated Cases* (KMK) (JCF)

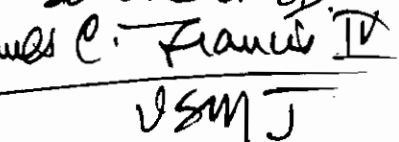
Dear Judge Francis:

In response to plaintiffs' discovery requests in *Dinler* and *Schiller*, defendants seek to produce intelligence documents prepared by the New York City Police Department in preparation for and during the Republican National Convention (the "Documents"). We also seek to produce the Documents in all RNC cases consolidated before Your Honor.

Due to the confidential nature of the Documents, identifying information contained therein, and the likelihood of public confusion regarding the content of the Documents if disclosed publicly, we respectfully request an order that the Documents shall be subject to an "attorneys-eyes only" designation and shall only be used in the litigation of the RNC cases consolidated before Your Honor. The attorneys-eyes only restriction shall remain in effect unless this Court subsequently orders otherwise. Plaintiffs' counsel in *Dinler* and *Schiller*, Mr. Dunn, consents to this application. In addition, because we intend to produce the Documents in all RNC Consolidated cases, we request that this Order apply and be docketed in all the RNC Consolidated cases.

Respectfully submitted,

  
Peter G. Farrell (PF-6781)  
Senior Counsel

1/12/07  
Application granted.  
SO ORDERED.  
  
JSMJ

cc. RNC Email Distribution List (via email)